

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	
<hr/>		
SCOTT M. SEIDEL, TRUSTEE, <i>et. al.</i> ,	§	
	§	
Plaintiffs,	§	ADVERSARY PROCEEDING
	§	NO: 23-03036
v.	§	
	§	ADVERSARY PROCEEDING
	§	NO: 23-03072
JAMES FRINZI, <i>et. al.</i> ,	§	
	§	
Defendants.	§	ADVERSARY PROCEEDING
	§	NO: 23-03090

**TRUSTEE’S RESERVATION OF RIGHTS REGARDING
WITHDRAWAL OF COUNSEL**

COMES NOW Scott M. Seidel (the “Trustee”), the trustee of Goodman Networks, Inc. and the plaintiff in each of the above-styled and numbered adversary proceedings (the “Adversary Proceedings”), and files this his *Reservation of Rights* with respect to the *Unopposed Motion to Withdraw as Counsel of Record* (the “Motion”), filed by Wick Phillips Gould & Martin, LLP (“Wick Phillips”), as follows:

1. The Trustee does not oppose the relief requested in the Motion.
2. Prior to the withdrawal of Wick Phillips, the Trustee served outstanding discovery on James Frinzi in each of these Adversary Proceedings, as well as prior and outstanding discovery on the Frinzi Family Trust and Multiband Global Resources, LLC in Adversary Proceeding No. 23-03036.
3. For the avoidance of doubt and to avoid any possible confusion, the Trustee informs Mr. Frinzi, Frinzi Family Trust, and Multiband Global Resources, LLC that said discovery remains

outstanding and is to be properly responded to and complied with; the Trustee has not been asked to agree, and has not agreed, to any postponement of any such discovery; the Trustee will resist any such postponement based on the possibility of replacement counsel; and Mr. Frinzi and the remaining defendants have ongoing duties and obligations to comply with scheduling orders and supplement previous discovery responses.

4. The Trustee intends to hold Mr. Frinzi and the remaining defendants to their duties and to seek all appropriate and applicable relief should there be any defaults, notwithstanding the withdrawal of Wick Phillips.

RESPECTFULLY SUBMITTED this 29th day of April, 2024.

MUNSCH HARDT KOPF & HARR P.C.

/s/ Davor Rukavina

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ATTORNEYS FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 29th day of April, 2024, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof.

/s/ Davor Rukavina

Davor Rukavina, Esq.